

# **EXHIBIT**

## **JJ**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF LISA ORTIZ AS PERSONAL REPRESENTATIVE FOR THE  
ESTATE OF ANGEL R. ORTIZ**

I, Lisa Ortiz, as Administrator of the Estate of Angel R. Ortiz, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. Angel Ortiz was a citizen of the United States on September 11, 2001, and he remained so until the time of his death on May 19, 2012. I was also a citizen of the United States on September 11, 2001, and I remain so today. Attached as Exhibit A to this Declaration are true and correct copies of my and Angel Ortiz's citizenship documents, as well as his death certificate and the Letters of Limited Administration from the state of New York appointing me as the Administrator for the estate of Angel Ortiz.

3. On September 11, 2001, Angel Ortiz was present and working at the Marriott World Trade Center when the terrorist attacks on the World Trade Centers occurred.

4. Angel Ortiz was a banquet waiter at the Marriott. On September 11, 2001, Angel was preparing banquet tables in a third floor ballroom when the first plane struck. Angel decided to evacuate the building because the pool located on the fourth floor had broken, and water was

running down the walls. Angel ran out a back entrance and tried to reach his vehicle, which was parked across the street. As he ran, the second plane hit. When he reached his vehicle, he was not allowed to move it because human body parts were on top of it. He was told to run. He saw people jumping from buildings, and the injured and bleeding around him. As he ran, the towers fell, and he was engulfed in clouds of debris. Angel fell and broke his ankle. When he finally made it home, his normally white uniform was grey from the soot, and he was so disoriented that he was still clutching the cutlery he had been placing on the banquet tables.

5. Angel Ortiz was at the Marriott World Trade Center when the planes hit the World Trade Center Towers. Angel Ortiz witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. Angel Ortiz was going about his everyday life in a peaceful manner when we were brutally attacked by terrorists and his life was altered forever.

6. As a result of these terrorist attacks, Angel Ortiz suffered the following specific injuries on September 11, 2001: a broken left ankle and post-traumatic stress disorder (“PTSD”).

7. Angel Ortiz suffered from severe PTSD and could no longer work. Angel Ortiz was a union member, and so afterwards the union placed him in other positions. Every time Angel tried to return to work, he became so scared and anxious he could not work. Angel was determined to be permanently disabled due to his PTSD, and received Worker’s Compensation and Social Security Disability.

8. Angel Ortiz sought medical attention for his physical and emotional injuries immediately after the attacks of 9/11 and up until his death in 2012. Angel went to a psychiatrist for PTSD and was prescribed medication to help him sleep. After his ankle injury, Angel took medications to curb the pain, and he sought additional treatment for his resulting ankle problems

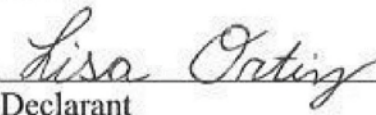
in the years after 9/11. Attached as Exhibit B to this Declaration is a true and correct copy of Angel Ortiz's select relevant medical records related to the treatments he received following the September 11, 2001 terrorist attacks.

9. Angel Ortiz suffered severe emotional distress as a result of the above terrorist attacks due to the horrific scenes he witnessed and endured. He was permanently disabled due to his PTSD, and his life was permanently impacted.

10. Angel Ortiz previously pursued a claim through the September 11th Victim Compensation Fund (VCF number unknown) specifically related to his physical injuries incurred on September 11, 2001, and his claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 23 day of December 2019.

  
Declarant

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**